

# Exhibit "E"

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DONALD BELL; KATRINA BELL,

Plaintiffs,

v.

Civil Action No. 2:05-cv-658-M

TRAVELERS PROPERTY CASUALTY  
INSURANCE COMPANY,

Defendants,

**PLAINTIFFS RESPONSE TO DEFENDANTS FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS**

COMES NOW, the Plaintiffs, Donald and Katrina Bell, and hereby responds to Defendant Standard Fire Insurance Company's Request for Production of Documents to Plaintiffs as follows:

1. Each and every document that relates to any conversation or communication that you have had with Standard Fire, any independent adjuster, or nay of Standard Fire's agents or representatives that relates to the incidents made the basis of this lawsuit.

**RESPONSE:** All documents in Plaintiffs possession responsive to Defendants request will be produced.

2. Each and every document containing statements made by Defendant Standard Fire or any person that relate to the incidents made the basis of this lawsuit.

**RESPONSE:** All documents responsive to Defendants request will be produced.

3. In paragraph 5 of your complaint, you state that you "home and contents sustained major damage due to Hurricane Ivan." Please produce each and every document that references or reflects the alleged damage to your home and contents.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

4. Please produce an itemization of, and each and every document that references or reflects, the areas of your home that you allege sustained damage and the items of contents that you allege sustained damage as a result of Hurricane Ivan.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

5. Please produce an itemization of, and each and every document that references or reflects, the specific repairs to your home and/or contents that you allege Defendant Standard Fire did not properly make.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

6. Please produce each and every document that references or reflect the existence and/or origins of any alleged "toxic mold, fungus and mildew" in your home as a result of the incidents made the basis of this lawsuit.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

7. Please produce each and every document that references or reflects any testing, inspection, or remediation of your home for toxic mold, fungus, or mildew, including but not limited to, any and all reports and invoices from any engineering, testing, or remediation companies.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

8. Please produce each and every documents that references or reflects any and all rental and or other expenses that you allege to have incurred as a result of Defendant Standard Fire's allege breach of its obligations to you.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

9. Please produce each and every document that supports your contention that Defendant Standard Fire "failed and/or refused to pay" for covered damages and losses.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

10. Please produce each and every document that supports you contention in your complaint that Defendant Standard Fire "Breached its contractual obligations by failing and refusing to properly pay the benefits due thereunder," including but not limited to, the specific provisions of the Standard Fire insurance policy that you claim were breached.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

11. Please produce each and every documents that supports your contention that Defendant Standard Fire "intentionally, and in bad faith, failed to fully investigate Plaintiffs' claim."

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

12. Please produce each and every document, including, but not limited to, any notes, email, correspondence, or memoranda, reflecting or relating to the incidents made the

basis of this lawsuit.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

13. Please produce each and every document, including, but not limited to, copies of health-care provider invoices, pharmacy receipts, or other documentation that supports your claim for emotional and mental distress injuries and/or medical diagnosis and/or allergic reactions sustained by any of you, as a result of the incidents made the basis of this lawsuit.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

14. Please produce each and every document that reflects or relates to any damages you claim in this lawsuit including but not limited to, economic damages, damages to your home and contents damages for loss of use, and damages for mental anguish and/or emotional distress.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

15. Please produce each and every policy of insurance issued to you by Standard Fire, including the specific policy provisions upon which you base the claims set forth in your complaint.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

16. Please produce each and every document that reflects or relates to any conversation or communication that you, or your attorney or other representative, have

has with any person regarding the value of the house made basis of this lawsuit either before or after Hurricane Ivan.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

17. For each and every expert identifies in response to Standard Fire's Interrogatories, please produce each and every document furnished to the expert for his or her study, examination and review; any and all reports of any such expert(s) that have been furnished to you, your attorney, or other representatives; and each and every document, correspondence, or other materials given to the expert for any purpose by you, your counsel, agents, and/or servants.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

18. Please produce each and every state and federal income tax return filed on you behalf five years prior to the incident made the basis of this lawsuit and each and every state and federal tax return filed on your behalf since the incidents made the basis of this lawsuit.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

19. Please produce each and every document that you intend to offer or to potentially offer at the trial of this case.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

20. Please produce each and every document used or referred to in the answering of

interrogatories propounded by Standard Fire.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

21. Please produce each and every documents that relates to or concerns any claims that you have filed with any insurance company in the past five years.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

22. Please produce copies of any and all insurance policies issued to you in the past five years.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

23. Please produce each and every document or other tangible item that you have received from Standard Fire.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

24. Please produce each and every photograph or videotape taken to substantiate your claims in this lawsuit.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

25. Please produce each an every written estimate, contract, bill, invoice, statement, or receipt prepared in connection with the incidents made the basis of this lawsuit, including but not limited to, the cost of repairs to the roof of the dwelling, cost of the repair from water, mold, or fungi damage, cleaning cost, medical bills, pharmacy

receipts, or any other document referencing bills or damages.

**RESPONSE: All documents in Plaintiffs possession responsive to Defendants request will be produced.**

/s/ Christopher E. Sanspree  
CHRISTOPHER E. SANSPREE  
Attorney for Plaintiffs

OF COUNSEL:

**BEASLEY, ALLEN, CROW,  
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(334) 269-2343  
(334) 954-7555 facsimile



**CERTIFICATE OF SERVICE**

I hereby certify that I have filed the original of the foregoing document in this Court with copies to be served upon all Defendants of record as listed below by placing a copy of same in the United States Mail, first class, postage prepaid on this the \_\_\_\_ day of \_\_\_\_\_ 2005.

**/s/ Christopher E. Sanspree**  
OF COUNSEL

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